



Brian J. Raymond

Director

Technology Policy

January 28, 2013

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353

Dear Mr. Chairman:

On behalf of the 12,000 members of the National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, we submit these comments in support of AT&T's "IP Transition" Petition. The pending Petition to start a geographic trial should provide the Commission with data on how best to initiate the transition toward the deployment of modern communications networks based on all Internet Protocol ("IP") technology.

Manufacturers have become increasingly dependent on broadband and IP-based services in their daily operations to connect with customers, employees, suppliers, and valued partners. Specifically, manufacturers leverage communications tools to track production and inventory, to provide online learning tools to employees, and to assist all aspects of customer service operations from ordering to final delivery of a product. As manufacturers and their customers rely on more data to grow their business the networks they use need to be capable of handling this activity. The transition to an advanced, next generation IP broadband network will begin to provide this capability and will result in substantial benefits to the manufacturing industry as well as consumers across the United States.

This acceleration of the deployment of IP-based networks and services will not only provide an immediate benefit to manufacturers it will also spur investment in America's infrastructure. This investment will help grow the economy and create new U.S. jobs. The geographically limited beta-trial proposed is expected to demonstrate that conventional 20th century regulation is no longer appropriate in the emerging all-IP ecosystem and should enable the FCC to consider what regulations, if any, may be needed after the transition.

Manufacturers need to access fully the operational and economic opportunities that high-speed broadband networks and services can offer. The start of a proceeding to consider how best to begin the process of accelerating the deployment of IP-based networks and services will increase innovation and allow manufacturers to maximize the use of high-speed broadband services.

Sincerely,

A handwritten signature in blue ink, appearing to read 'B. Raymond', is written over a blue circular stamp. The signature is fluid and cursive.

Brian J. Raymond
Director, Technology Policy

Leading Innovation. Creating Opportunity. Pursuing Progress.